

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

Dated: February 25, 2008

Signature:

(Maureen Divito)

Docket No.: 1801270.00125US1
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent No.: 7,203,933

Inventors: Jason Souloglou
Alasdair Rawsthorne

Filed: April 6, 2001

Title: Program Code Conversion

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

**NOTIFICATION OF LOSS OF ENTITLEMENT TO SMALL ENTITY
STATUS UNDER 37 CFR 1.28**

Dear Sir:

Assignee, Transitive Limited, hereby notifies the Patent and Trademark Office that the claim for small entity status filed by the Applicants is hereby withdrawn.

Assignee established status as a small entity in good faith, and Assignee has paid fees to date in good faith as a small entity for this application. Assignee has recently discovered that its status as a small entity may have been established in error. Assignee believes that it may still be a small entity, that it may have been a small entity at the time it established status as a small entity, and that a change in status is unnecessary. However, in an abundance of caution, Assignee chooses to withdraw its claim for small entity status.

At or around the time of paying the issue fee for this application, the undersigned confirmed that the Assignee had a sufficiently small number of employees so that it qualified for payment of fees as a small entity. At that time, the undersigned inquired as to the existence of any agreements or licenses of any rights in the invention to any person, concern, or organization that would not qualify for small entity status. No such agreements or licenses were found. As such, Applicants filed the issue fee for this application as a small entity.

The undersigned recently discovered the existence of an agreement between Assignee and a third party relating to the delivery of software and services from Assignee to the third party. The third party does not qualify as a small entity, and the agreement predates the paying of the issue fee for this patent. The agreement is not fashioned as a patent license agreement, but instead as an agreement relating to the use of works received from Assignee. The agreement, however, does contain provisions that might be construed as a license of patent rights. Although Assignee believes that it may still properly qualify as a small entity even in light of this agreement, in an abundance of caution, Assignee hereby withdraws its claim for small entity status.


The itemization of the deficiency payment as required by 37 CFR 1.28(c)(2) is set forth below.

Fee Type	SE Fee Paid	Current LE Fee	Deficiency
Utility Issue Fee	\$700.00	\$1440.00	\$740.00
Publication fee	\$300.00	\$300.00	0
		Total Deficiency	\$740.00

Applicant believes a payment in the amount of \$740 is due with this response. Please charge our Deposit Account No. 08-0219, under Order No. 1801270.00125US1, from which the undersigned is authorized to draw. If any additional fee is due, please charge this same deposit account.

Respectfully submitted,

Dated: February 25, 2008



Ronald R. Demsher
Registration No.: 42,478
Attorney for Applicant(s)

Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, Massachusetts 02109
(617) 526-6000 (telephone)
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Effective on 12/08/2004. Fees pursuant to the Consolidated Appropriations Act, 2005 (H.R. 4818). <h2 style="margin: 0;">FEE TRANSMITTAL</h2> <h3 style="margin: 0;">For FY 2008</h3>		Complete if Known	
<input type="checkbox"/> Applicant claims small entity status. See 37 CFR 1.27		Application Number	Patent#: 7,203,933
		Filing Date	Issued: April 10, 2007
		First Named Inventor	Jason SOULOGLOU
		Examiner Name	M. J. Yigdall
		Art Unit	2192
TOTAL AMOUNT OF PAYMENT		(\$)	740.00
		Attorney Docket No.	1801270.00125US1

METHOD OF PAYMENT (check all that apply)	
<input type="checkbox"/> Check <input type="checkbox"/> Credit Card <input type="checkbox"/> Money Order <input type="checkbox"/> None <input type="checkbox"/> Other (please identify): _____	
<input checked="" type="checkbox"/> Deposit Account Deposit Account Number: 08-0219 Deposit Account Name: Wilmer Cutler Pickering Hale and	
For the above-identified deposit account, the Director is hereby authorized to: (check all that apply)	
<input checked="" type="checkbox"/> Charge fee(s) indicated below <input type="checkbox"/> Charge fee(s) indicated below, except for the filing fee	
<input checked="" type="checkbox"/> Charge any additional fee(s) or underpayments of fee(s) under 37 CFR 1.16 and 1.17 <input checked="" type="checkbox"/> Credit any overpayments	

FEE CALCULATION							
1. BASIC FILING, SEARCH, AND EXAMINATION FEES							
Application Type	FILING FEES		SEARCH FEES		EXAMINATION FEES		Fees Paid (\$)
	Fee (\$)	Small Entity Fee (\$)	Fee (\$)	Small Entity Fee (\$)	Fee (\$)	Small Entity Fee (\$)	
Utility	310	155	510	255	210	105	
Design	210	105	100	50	130	65	
Plant	210	105	310	155	160	80	
Reissue	310	155	510	255	620	310	
Provisional	210	105	0	0	0	0	
2. EXCESS CLAIM FEES							
						Small Entity	
						Fee (\$)	Fee (\$)
Each claim over 20 (including Reissues)						50	25
Each independent claim over 3 (including Reissues)						210	105
Multiple dependent claims						370	185
<u>Total Claims</u>		<u>Extra Claims</u>	<u>Fee (\$)</u>	<u>Fee Paid (\$)</u>	<u>Multiple Dependent Claims</u>		
- 20 =		x	=		<u>Fee (\$)</u>		<u>Fee Paid (\$)</u>
HP = highest number of total claims paid for, if greater than 20.							
<u>Indep. Claims</u>		<u>Extra Claims</u>	<u>Fee (\$)</u>	<u>Fee Paid (\$)</u>			
- 3 =		x	=				
HP = highest number of independent claims paid for, if greater than 3.							
3. APPLICATION SIZE FEE							
If the specification and drawings exceed 100 sheets of paper (excluding electronically filed sequence or computer listings under 37 CFR 1.52(e)), the application size fee due is \$260 (\$130 for small entity) for each additional 50 sheets or fraction thereof. See 35 U.S.C. 41(a)(1)(G) and 37 CFR 1.16(s).							
<u>Total Sheets</u>	<u>Extra Sheets</u>	<u>Number of each additional 50 or fraction thereof</u>	<u>Fee (\$)</u>	<u>Fee Paid (\$)</u>			
- 100 =	/50 =	(round up to a whole number) x	=				
4. OTHER FEE(S)							
						<u>Fees Paid (\$)</u>	
Non-English Specification, \$130 fee (no small entity discount)							
Other (e.g., late filing surcharge): 1501 Utility issue fee - paid \$700 - paying LE balance						\$740.00	
1504 Publication fee - paid \$300...							

SUBMITTED BY			
Signature	/Ronald R. Demsher/	Registration No. (Attorney/Agent)	42,478
Telephone	(617) 526-6000		
Name (Print/Type)	Ronald R. Demsher	Date	February 25, 2008

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).	
Dated: February 25, 2008	Electronic Signature for Maureen Divito: /Maureen Divito/